

EXHIBIT 16

Christopher Markos

From: Christopher Markos
Sent: Monday, April 11, 2022 12:02 PM
To: 'Elizabeth L. Kramer'; Cathleen A. Sheaffer; jessicdavi@pa.gov; KHull@mcneeslaw.com; Chris Gerber (cpgerber@sianalaw.com); Boynton, Alan (ABoynton@mcneeslaw.com); rich@raiderslaw.com; lbedell@attorneygeneral.gov; Carfley, Stephanie (SCarfley@mcneeslaw.com); Connie E. Henderson (cehenderson@sianalaw.com)
Cc: Frank J. Lavery, Jr.; Aimee Paukovits; Mindy S. Kushner
Subject: RE: Gerhart, Ellen, et al. v. Energy Transfer Partners, et al. - Defendant TigerSwan's Responses to Plaintiff's 1st Request for Production of Documents

I would ask that we be able to show the parties the documents bates stamps DF TigerSwan 1-2012. I am fine with not providing hard copies. If that is acceptable, we don't need to further discuss the designation.

I am also requesting that you provide a copy of the whatsapp conversation for which a link is included at "DF TigerSwan 1938," as well as emails from n.johnson@tigerswan.com; r.rice@tigerswan.com; and r2@tigerswan.com that reference the following search terms: "Gerhart, Gerharts, Elise, Ellen, Camp White Pine, anarchist, anarchists, anarchism, Huntingdon, Robert / Angelo; Roberto / Bricchi; PA Progress; Badger. I will provide a formal request shortly.

Christopher Markos, Esq.
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One South Broad Street, Suite 1510
Philadelphia, PA 19107
P: (215) 557-0099

[NOTE OUR NEW ADDRESS](#)

From: Elizabeth L. Kramer <ekramer@laverylaw.com>
Sent: Friday, April 8, 2022 3:58 PM
To: Cathleen A. Sheaffer <CSheaffer@laverylaw.com>; Christopher Markos <cmarkos@williamscedar.com>; jessicdavi@pa.gov; KHull@mcneeslaw.com; Chris Gerber (cpgerber@sianalaw.com) <cpgerber@sianalaw.com>; Boynton, Alan (ABoynton@mcneeslaw.com) <ABoynton@mcneeslaw.com>; rich@raiderslaw.com; lbedell@attorneygeneral.gov; Carfley, Stephanie (SCarfley@mcneeslaw.com) <SCarfley@mcneeslaw.com>; Connie E. Henderson (cehenderson@sianalaw.com) <cehenderson@sianalaw.com>
Cc: Frank J. Lavery, Jr. <flavery@laverylaw.com>; Aimee Paukovits <apaukovits@laverylaw.com>; Mindy S. Kushner <MKushner@laverylaw.com>
Subject: RE: Gerhart, Ellen, et al. v. Energy Transfer Partners, et al. - Defendant TigerSwan's Responses to Plaintiff's 1st Request for Production of Documents

Good afternoon,

I just want to highlight that we have designated these documents as for counsel's eyes only pursuant to the Confidentiality Agreement. If there are any questions about this designation, please reach out to Frank or I.

Thanks,

Elizabeth L. Kramer, Esquire
Lavery Law
225 Market Street, Suite 304
P.O. Box 1245

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From: Cathleen A. Sheaffer
Sent: Friday, April 8, 2022 2:58 PM
To: Christopher Markos (cmarkos@williamscedar.com); jessicdavi@pa.gov; KHull@mcneeslaw.com; Chris Gerber (cpgerber@sianalaw.com); Boynton, Alan (ABoynton@mcneeslaw.com); rich@raiderslaw.com; lbedell@attorneygeneral.gov; Carfley, Stephanie (SCarfley@mcneeslaw.com); Connie E. Henderson (cehenderson@sianalaw.com)
Cc: Frank J. Lavery, Jr.; Elizabeth L. Kramer; Aimee Paukovits; Mindy S. Kushner
Subject: Gerhart, Ellen, et al. v. Energy Transfer Partners, et al. - Defendant TigerSwan's Responses to Plaintiff's 1st Request for Production of Documents

I am writing to provide you with Defendant TigerSwan's Responses to Plaintiff's 1st Request for Production of Documents and document production (batedamped - " DF TigerSwan 1-2012") in the above referenced matter.

<https://laverylaw.sharefile.com/d-s4aeec48369524382b79cbe7fa4868f9e>

Thank you for your attention to this matter.

Cathy

Cathleen A. Sheaffer, RP®, Pa. C.P.

Senior Paralegal

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